

Attachment 15

04140

1 BEFORE THE WASHINGTON UTILITIES AND

2 TRANSPORTATION COMMISSION

3 In the Matter of the)

Investigation into)

4)

U S WEST COMMUNICATIONS, INC.'s) Docket No. UT-003022

5) Volume XXX

Compliance with Section 271 of) Pages 4140 to 4414

6 the Telecommunications Act of)

1996)

7 -----)

In the Matter of)

8) Docket No. UT-003040

U S WEST COMMUNICATIONS, INC.'s) Volume XXX

9) Pages 4140 to 4414

Statement of Generally)

10 Available Terms Pursuant to)

Section 252(f) of the)

11 Telecommunications Act of 1996)

_____)

12

13 A Workshop in the above matters was held on

14 July 11, 2001, at 8:30 a.m., at 1300 South Evergreen

15 Park Drive Southwest, Room 206, Olympia, Washington,

16 before Administrative Law Judge ANN RENDAHL.

17 The parties were present as follows:

18 THE WASHINGTON UTILITIES AND TRANSPORTATION

COMMISSION, by PAULA STRAIN and DAVE GRIFFITH, 1400

19 South Evergreen Park Drive Southwest, Post Office Box

40128, Olympia, Washington, 98504-0128.

20

WORLDCOM, INC., by ANN HOPFENBECK, Attorney

21 at Law, 707 - 17th Street, Suite 3900, Denver, Colorado

80202.

22

AT&T, by SARAH KILGORE, Attorney at Law, and

23 via bridge line by REBECCA DECOOK, Attorney at Law, 1875

Lawrence Street, Suite 1575, Denver, Colorado 80202.

24

Joan E. Kinn, CCR, RPR

25 Court Reporter

04316

1 MR. WILSON: Mr. Zulevic wants to do Part B.

2 JUDGE RENDAHL: And does that address Section
3 9.2.2.8?

4 MR. WILSON: I believe -- .

5 JUDGE RENDAHL: Or 9.2.4.3?

6 MS. SACILOTTO: 9.2.2.8 is just the generic
7 section that describes our loop qual tool, so it's more
8 or less an arbitrary designation.

9 JUDGE RENDAHL: It's not an SGAT language
10 issue, it's an issue arising out of how Qwest is
11 providing the service?

12 MS. SACILOTTO: Right.

13 MR. WILSON: Yes, and I guess you could say
14 that if the Commission agreed with the CLECs, we should
15 add a paragraph 2 to the SGAT to give us for part A
16 access to LFACs.

17 JUDGE RENDAHL: Okay, so is there a response
18 from Qwest on A?

19 MS. LISTON: Yes, there is, thank you.

20 The LFACs data base is an assignment data
21 base, and Qwest uses it to make actual line assignments.
22 The information that's stored in LFACs has the loop
23 makeup information, what kind of gauge it is, where the
24 pair, you know, what terminals it goes through. Qwest
25 has made that information available.

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1 JUDGE RENDAHL: Ms. DeCook, your radio is
2 playing wonderful music, but I think we need to turn it
3 off. Maybe it's not Ms. DeCook. Is there someone on
4 the bridge line listening in?

5 Well, we will enjoy the music.

6 Okay, Ms. Liston.

7 MS. LISTON: So the data that's stored in the
8 LFACs data base in terms of loop makeup information is
9 provided to the CLECs through various loop qualification
10 tools. We focus primarily on the raw loop data tool.
11 If we look at the raw loop data tool, there's two
12 different venues that the CLECs have access to the raw
13 loop data. One is at a telephone number basis. The
14 other is at an address number basis. They also can get
15 it at an entire wire center level basis. So one of the
16 issues that was raised by Ken a minute ago about is the
17 community served by iDLC and can we know that, if the
18 wire center level reports were pulled, it would show
19 where there's a concentration of iDLC, and they would be
20 able to have that information available.

21 The tool is -- LFACs is not a search engine
22 tool to look for facilities or anything, but it's really
23 an assignment tool. So you can't go in and say, tell me
24 where you have spare capacity. What you wind up doing
25 instead is say, I need a circuit from point A to point

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1 given information availability on spares through
2 facility check issues parity with retail, and nowhere
3 does Qwest provide direct access to LFACs to our sales
4 representatives, and it's not a tool to be used for a
5 search engine. It would require significant system
6 changes to do what Mr. Wilson said.

7 MS. SACILOTTO: Jean, could you discuss a new
8 exhibit that we're submitting in Washington, which is
9 one we handed out earlier this morning, 939, it's from
10 the ROC test.

11 JUDGE RENDAHL: Let's be off the record.

12 (Discussion off the record.)

13 JUDGE RENDAHL: We were discussing Exhibit
14 939.

15 MS. LISTON: 939 is a copy of -- from the
16 master test plan to the OSS test that will be done to
17 validate that the loop qualification process and the
18 data that we provide is in parity between wholesale and
19 retail. And these are the specific steps that the
20 process will go through to make sure that the
21 information that we provide to CLECs is consistent with
22 what we do on a retail basis also. So in terms of a
23 parity issue, we will be testing that through the OSS
24 test.

25 MR. WILSON: And it's AT&T's position that

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1 the UNE remand says that the CLECs should have the same
2 information as the ILEC personnel, not the ILEC retail
3 personnel, so we don't feel that that parity with retail
4 in this situation is the bench mark. We're -- we need
5 this for back office, not for our retail personnel, to
6 see more generally where spare facilities are so that we
7 can provision in general to neighborhoods in alternative
8 ways.

9 And Qwest can do this with their other
10 operations people. And it may be that Qwest should
11 offer other data bases such as LAID or LEAD, which in
12 other jurisdictions they said might be more appropriate
13 for the information we need. We mainly need the
14 information. I think the secondary concern is which
15 data base.

16 MS. LISTON: And Qwest's position is that the
17 LFACs data base and even some of the other data bases
18 that Mr. Wilson referred to are not searchable tools
19 where they would show the spare facilities.

20 When you think about spare facilities, you
21 can have two different kinds. One is where we have a
22 facility in place end to end for a specific customer,
23 and that would be -- it's kind of in place, but it's not
24 in use. That information will be made available to the
25 CLECs through raw loop data tools. Some of it is

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1 for qualification.

2 MR. ZULEVIC: So you did not use the MLT tool
3 specifically for that?

4 MS. LISTON: No.

5 MR. ZULEVIC: You did say that at one time
6 you did do a total run of MLT to input as a data field
7 into the raw loop data tool. Was that done coincidental
8 with this, or is that something that was done later?

9 MS. LISTON: This is an interesting thing,
10 and, in fact, I don't know if we have ever had this
11 discussion, but when Qwest first started doing megabyte
12 qualification, we were using LFACs data. And what I'm
13 gathering from some of the other ILECs is that LFACs
14 data is being used for qualification issues. What we
15 were finding was a fairly high reject rate using
16 straight LFACs data.

17 As a result of that, the loop qualification
18 data base was built, and it included things like the MLT
19 distance in it. And at that point in time, everything
20 was, you know, I'm not sure how they did the overall
21 bulk test thing, but it was loaded into the data base,
22 and then they started using that for qualification for
23 megabyte. That data base that we used for qualification
24 of megabyte is then also the same data base that we have
25 made available to the CLECs for qualification.

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1 And what we found was by using the RLD data
2 base information, that we were getting better success
3 rate than using straight LFACs data, and one of the
4 pieces has to do with the MLT just as, you know, as a
5 cross check on overall loop length. So we only -- the
6 only thing that we use for qualification is the same
7 tool that we have provided to the CLECs.

8 JUDGE RENDAHL: Ms. Doberneck and then
9 Mr. Wilson, did you have a thought.

10 MS. DOBERNECK: I may be dense, I am not
11 certain yet I understand exactly what Qwest and how it
12 did it to get that MLT link into the raw loop data tool.
13 My understanding has always been that in connection with
14 the development of the raw loop data tool, Qwest did a
15 sort of one time only bulk complete, you know, for all
16 those loops connected to a switch MLT test to the extent
17 it could and then plugged that into the raw loop data
18 tool. So my understanding always was that the MLT
19 capability that we have been asking for on a pre-order
20 basis is what Qwest itself did at one point in
21 connection with the development of the raw loop data
22 tool, and that was my understanding based on discussions
23 elsewhere. Am I wrong, or is that correct?

24 MS. LISTON: That is -- that's my
25 understanding.

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1 design facilities, a couple of issues I would like to
2 mention on this issue. One of these -- one of the
3 issues is that as a design engineer and outside plant
4 engineer, we don't have access ourselves to IOF
5 facilities. Even under the same -- if they're in the
6 same sheath, IOF and design, outside plant design
7 facilities, the IOF facilities are basically reduce
8 those numbers of strands of fibers are reduced from the
9 availability of the full count of that fiber. So as a
10 design engineer, we don't even see those fibers as being
11 available.

12 When you place, on the second issue, when you
13 place IOF and design facilities in the outside plant,
14 most of the times they're in what we call splice cases
15 or waffle cases. When you splice fiber in a waffle
16 case, the IOF is spliced in an inner compartment of that
17 waffle case, and the design, outside plant design
18 circuits are then placed in trays that are then separate
19 from the IOF facilities.

20 JUDGE RENDAHL: Mr. Hubbard, can you --

21 MR. HUBBARD: And they don't have access.

22 JUDGE RENDAHL: Can you explain, is that a
23 waffle case?

24 MR. HUBBARD: Waffle case, it's a splice
25 case, water tight splice case.

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1 JUDGE RENDAHL: Is it like what you eat, I
2 mean is it spelled like what you eat, waffle, or is it
3 an acronym for something?

4 MR. HUBBARD: No, it's spelled just like you
5 eat it.

6 JUDGE RENDAHL: Thank you, I just wanted to
7 confirm for the record.

8 Okay, go ahead.

9 MR. HUBBARD: It's kind of waffle shaped, if
10 you will.

11 Like I was stating, in the waffle case, we
12 have IOF facilities in there. They're in an inner
13 compartment that's closed and segregated from the
14 outside plant facilities or the fibers for outside
15 plant. And so basically the splicers do not have access
16 to those inner fibers that are designated as IOF.

17 MS. SACILOTTO: Jeff, could you clarify for
18 those of us who are not engineers what you mean by the
19 design circuits, are those as opposed to the IOF, which
20 was what we're talking about?

21 MR. HUBBARD: I guess what I was referring to
22 when I was talking, if I said design, I meant the
23 outside plant type of circuits, if you will, that are --

24 MS. SACILOTTO: Loops?

25 MR. HUBBARD: Loops, not loops, but the

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1 fibers basically.

2 MS. SACILOTTO: Okay. And just to clarify,
3 does Qwest for itself if it needs extra loop facilities,
4 does it redesignate working IOF as new facilities for
5 itself?

6 MR. HUBBARD: I could never say never on
7 that, but I haven't seen them do that. As a design
8 engineer, I could never get IOF to release any fibers to
9 me to redesignate as distribution, if you will.

10 MS. SACILOTTO: And what does Qwest do if it
11 retires IOF or replaces it with new facilities if those
12 interoffices -- what does it do with those facilities?
13 We had a discussion about this in other jurisdictions.

14 MR. HUBBARD: Yeah, it -- older trunk cables
15 that were copper facilities that were replaced with
16 interoffice facilities that are of fiber, if that copper
17 cable that was once a trunk cable or interoffice cable
18 is still in good shape, it can be redesignated as
19 distribution or feeder cables and put into a normal
20 outside plant.

21 MR. WILSON: Would Qwest do that before, for
22 a CLEC, before it would declare a route not available
23 because of lack of facilities if you had old copper that
24 had been used for trunks that could be redesignated, was
25 idle essentially, but currently designated as IOF, would

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1 Qwest redesignate that for a CLEC?

2 MR. HUBBARD: Like I said, that old copper
3 cable that would have been converted to fiber would have
4 to be totally spare and still in good shape to
5 redesignate, but it would be after all the IOF
6 facilities were transferred over to the fiber
7 facilities, if you will.

8 JUDGE RENDAHL: Mr. Zulevic has a question
9 and also Mr. Dittmore.

10 MR. ZULEVIC: More comment than question
11 actually. In a previous life, I did some integrated
12 planning, which consisted of both IOF as well as feeder
13 route planning, and it was my experience that while we
14 were looking at that, we took a look at our forecast and
15 allocated a certain portion for IOF and a certain
16 portion for loop on a basic route, and hopefully we got
17 our forecast right. But if not, the fiber is still
18 there and available to either be used for one or the
19 other depending on how far you taper the fiber.

20 But even though I understand the fact that
21 the loop plant people don't have ready access to all the
22 data on the IOF, I think that in situations where you
23 would have to hold an order that that data can be made
24 available, and if for some unknown reason the
25 requirement for the interoffice facility portion was

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1 think pretty straightforward. Qwest is providing line
2 splitting over UNE-P, and this next issue is to provide
3 the same line splitting over a UNE loop. And I think we
4 have had some progress from Qwest on this, but I guess
5 we would like to see if we have a date by which that
6 will be available.

7 MS. LISTON: The loop splitting is -- there's
8 a deployment date of August the 1st for loop splitting.
9 Qwest will be providing loop splitting.

10 MR. SEKICH: Ms. Liston, Dominick Sekich. If
11 you could briefly for the record, I think it is in your
12 comments, but could you explain the difference between
13 loop splitting and line splitting as Qwest sees it?

14 MS. LISTON: Line splitting is strictly the
15 provisioning of a splitting arrangement using a UNE-P
16 platform. The loop splitting uses the unbundled loop
17 basis. So it would be a CLEC or a DLEC purchases an
18 unbundled loop, and they want to also split that loop
19 and use both voice and data on the one loop.

20 JUDGE RENDAHL: Mr. Zulevic.

21 MS. DOBERNECK: I just wanted --

22 JUDGE RENDAHL: Ms. Doberneck.

23 MS. DOBERNECK: Just to make certain our
24 record is clear here, it's Qwest's position that it is
25 obligated to provide line splitting, which is the UNE-P

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1 product, by the -- pursuant to the FCC's order, but that
2 beyond that, any other product offered by Qwest is a
3 voluntary offering and is not required under the FCC's
4 order; is that correct?

5 MS. LISTON: I believe the way I have
6 described it is that Qwest believes there was some
7 ambiguity in the FCC order, and based on workshop
8 discussions, Qwest agreed to go ahead and provide the
9 loop splitting.

10 MS. DOBERNECK: But I just wanted to confirm
11 Qwest's position, which is Qwest doesn't think it has a
12 direct and unambiguous obligation to provide anything
13 other than line splitting at this point in time; is that
14 correct?

15 MS. LISTON: I think it's almost a moot
16 point. I mean I think we -- our position and what I
17 just finished saying was that the FCC's order in our
18 interpretation was ambiguous in terms of loop splitting.
19 Qwest has agreed to provide it. I don't -- I mean we
20 have said that there's ambiguity in it and we will do
21 it. We did not say that the FCC has specifically
22 ordered loop splitting, if that's the question.

23 MS. DOBERNECK: Right.

24 MS. LISTON: We do not believe there was a
25 direct correlation, we think there was ambiguity, but we

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1 have agreed to do it, and it will be implemented on
2 August 1st.

3 MS. DOBERNECK: And I think with that answer,
4 you clarified for my purposes what we need.

5 JUDGE RENDAHL: Mr. Sekich.

6 MR. SEKICH: Very briefly. Where in the SGAT
7 is your loop splitting offering memorialized?

8 MS. LISTON: It's Section 9.24.

9 MR. SEKICH: Thank you.

10 JUDGE RENDAHL: Okay, so at this point, can
11 we consider this closed or still open pending SGAT
12 language? I mean I'm not sure what the resolution is
13 here.

14 MR. STEESE: The SGAT language has been in
15 for several months now. The parties have discussed the
16 language. The question was really one of what
17 Ms. Doberneck just said, the impasse issue came about
18 whether we thought there was an obligation or not, and
19 so the implementation date is August 1st at this point.

20 JUDGE RENDAHL: Mr. Zulevic.

21 MR. ZULEVIC: Yeah, just briefly, and this
22 may help us move through a couple of the other items
23 that are yet to be discussed, but that is kind of the
24 root of a number of these issues is what is Qwest's
25 actual obligation under the line splitting order. And

Attachment 16

**Qwest Manual Order Entry
Performance Indicator Description
Adequacy Study**



June 11, 2002

Background

During the ROC OSS test, Hewlett-Packard (HP) Consulting, acting as the Pseudo-CLEC (P-CLEC), submitted a variety of orders that resulted in manual handling by reps in Qwest's Service Centers. These manually handled orders can be grouped into three general categories: orders entered manually that are designed to be processed manually; orders entered electronically that are designed to be processed manually (non-flow through); and, orders entered electronically that are designed to flow through, but that actually fell out for manual handling.

HP Consulting noted through Observations and Exceptions that many of these manually handled orders were not correctly processed by Qwest reps. Qwest researched the orders questioned in the Observations and Exceptions, and, in many cases, represented that the rep had made an error.

The number of instances in which Qwest asserted rep error caused KPMG Consulting to write an Observation questioning whether Qwest's training of reps is effective. Qwest responded by enhancing its training materials, programs and processes, and by proposing additional performance measures that might help monitor certain aspects of manual order handling.

KPMG Consulting conducted a review of Qwest's enhanced rep training, and became satisfied that, if properly executed, the revised training regime could operate to reduce the likelihood of rep error. However, due to a decision taken by the ROC Steering Committee, no transaction retesting was performed of the changes and improvements made by Qwest. Therefore KPMG Consulting was not able to determine if the changes made by Qwest were effective in actually reducing the number of rep errors.

The ROC Steering Committee expressed a strong desire to see that adequate performance measures are in place to monitor manual order handling on a going-forward basis. Accordingly, the Steering Committee sponsored an MTP Change Request that directed KPMG Consulting to conduct this study of the adequacy of existing and proposed performance measures related to manual order handling.

Objective

The primary objective of this study is for KPMG Consulting to express a professional opinion on the adequacy of existing and proposed performance measures to monitor the effectiveness of manual order handling by Qwest. In addition, we are to propose any revisions to existing performance measures, or additional performance measures, that would strengthen the tools for monitoring manual order processing performance.

KPMG Consulting is on record as stating that, in our professional opinion, definition of performance measures is best conducted in a public forum using due process. However, we have agreed to express our professional opinion on the adequacy of performance measures in this area in order to satisfy the express

wishes of the Steering Committee. The opinions expressed herein do not constitute statements of fact, and do not carry the weight of findings such as those contained in our Final Report on the ROC OSS test.

Approach

KPMG Consulting used the following approach to accomplish the objectives of this study

- Identify the interactions and communications between Qwest and the CLEC for manually handled orders;
- Identify the aspects of those interactions and communications that would be impacted by rep errors;
- Determine what types of performance measures would reflect the impact on CLECs of errors made by reps;
- Determine whether or not existing or proposed measures cover these potential measures; and
- Determine what changes to existing measures, or additional measures, if any, might be appropriate.

In thinking about our approach, KPMG Consulting also made the determination that the primary focus of this review should be on the manual order entry aspects of the manual order process, to the exclusion of downstream activities such as provisioning that are not unique to manually handled orders.

Opinion

Below we present our professional opinion by discussing the timeliness and accuracy aspects of manual order handling. By timeliness we mean either the timely transmission of the response to the CLEC, or the timely performance of activities by Qwest. By accuracy we mean either that the response is well formed, per the business rules, with no fields or field values missing, incorrect or superfluous, or that the activity performed by Qwest was done according to specifications.

In some cases, we also comment on the minimum level of disaggregation in reporting that we deem appropriate.

Because KPMG Consulting did not conduct the Metrics Audit for the ROC OSS test, we express no opinion on whether or not existing measures, as implemented, actually accomplish their objective as stated in the PID.

Functional Acknowledgements

There are currently no performance measures for timeliness or accuracy of Functional Acknowledgements of manually submitted orders. In our opinion, it is important that a CLEC receive positive acknowledgement from Qwest of the receipt of all orders so that there is no question as to whether or not Qwest is

working the order. Important time can be lost if the order is not being processed by Qwest, and neither party is aware of that fact.

Timeliness

KPMG Consulting proposes that a benchmark standard be established that articulates the target timeframe for sending Functional Acknowledgements for manually submitted orders, and defines a percentage of manually submitted orders that must be acknowledged within the timeframe. KPMG Consulting has no specific recommendations on levels of disaggregation for the proposed measure.

Accuracy

KPMG Consulting proposes that a benchmark accuracy standard be established for Functional Acknowledgements of manually submitted orders that defines the percentage of manually submitted orders that must receive an accurate Functional Acknowledgement. KPMG Consulting has no specific recommendations on levels of disaggregation for the proposed measure.

Errors

It is important that a CLEC receive prompt notification of any errors that exist in submitted orders. It is also important that a CLEC not be told that an order is in error if it is, in fact, correct because of the potential waste of resources in erroneously investigating a non-problem, and the potential for delay that may be introduced in processing the order.

Timeliness

The existing PO3 measure seems to address the intervals associated with LSR Rejection Notices, and calls for disaggregation in reporting that includes both LSRs received manually, and those received electronically but handled manually.

KPMG Consulting has no suggested changes to either the timeliness aspects of this measure, or its levels of disaggregation.

Accuracy

There are currently no performance measures that address the accuracy of LSR Rejection Notices. KPMG Consulting proposes that a benchmark standard be established that sets forth the percentage of LSR Rejection Notices that must be accurate. We would further suggest that reporting for this measure be disaggregated to reflect the levels of performance of both manually submitted orders, and electronically submitted orders that fall out for manual handling.

FOCs

FOCs provide a CLEC with an indication that the order contains no errors, and that the order will be processed.

Timeliness

The current performance measure PO5 seems to address timeliness of FOCs. KPMG Consulting has no additional suggestions for this measure, or its levels of disaggregation.

Accuracy

Other than the fields required to match the FOC with the LSR (e.g., PON), FOCs do not contain any information of significance except for the committed due date. Therefore, KPMG Consulting does not believe that any measures for FOC accuracy are required. See our opinion below for our comments on due date issues.

Due Dates

CLECs request due dates on orders submitted to Qwest. Qwest communicates committed due dates back to CLECs in the body of FOCs, and subsequently amends those expectations, when required, through subsequent notifiers.

It is KPMG Consulting's opinion that errors made by reps in entering order information can result in orders not being fulfilled on time. At the same time, KPMG Consulting recognizes that other Qwest personnel can make errors, and that these errors may also result in the order not being fulfilled on time. Indeed, both types of errors can compound one another.

KPMG Consulting also recognizes that it is not possible for a CLEC or regulator to determine the root cause of Qwest's failure to meet the due date committed to in the FOC. Neither is it possible for a CLEC or regulator to determine, for manually handled orders, whether or not some or all of the reason for a delay was caused by a rep error.

Nevertheless, KPMG Consulting believes that monitoring due date performance by Qwest, with levels of disaggregation that reflect the previously discussed three alternative paths to manual order handling, is of utmost importance. Accordingly KPMG Consulting makes the following recommendations with respect to due dates:

Timeliness

CLECs set customer expectations for due dates based upon the dates returned by Qwest in the FOC. The timeliness of service delivery is very important if CLECs are to maintain satisfactory relationships with their customers.

OP3 (Installation Commitments Met) and OP4 (Average Installation Interval) currently measure different aspects of the timeliness of service delivery. The measures disaggregate by "product," and by dispatches within/without MSA and no dispatch. KPMG Consulting recommends that additional levels of disaggregation be reported for these two measures that reflect the following three

categories: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Accuracy

Qwest publishes a Standard Interval Guide (SIG) that helps set CLEC expectations for the intervals associated with different service delivery scenarios. In addition, CLECs can request, through pre-order queries, more specific due date availability information on a per-order basis.

However, events can transpire in the normal course of business such that Qwest cannot perform at a level that is consistent with either the SIG, or the information provided in the pre-order response. In these cases, the due date returned to the CLEC may differ from both the SIG, and the pre-order query.

CLECs rely on the SIG and/or the pre-order queries to plan their business activities, and to help establish the requested due dates submitted in orders. KPMG Consulting is aware that Qwest offers these two tools only as guidelines, and further represents that the date returned in the FOC is the date that should be used by CLECs to set customer expectations.

However, KPMG Consulting is of the opinion that the relationship between the SIG/query intervals, and the actual committed-to interval implied by the FOC due date, is important to monitor so that a material divergence between the two does not exist for an extended period of time.

Accordingly, KPMG Consulting proposes that a new diagnostic performance measure be established that measures the percent of FOC due dates that fall within the interval published in the SIG. KPMG Consulting recommends that the three levels of disaggregation be reported for this measure: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Another issue associated with the FOC due date is the number of times that a due date is changed by Qwest after the FOC is issued. OP15 (Number of Due Date Changes per Order) is designed to measure this, but does not include any levels of disaggregation. KPMG Consulting recommends that three levels of disaggregation be reported for this measure: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Service Order Accuracy

Many of the errors a rep can make will result in differences between what was ordered by the CLEC, and what was contained in Qwest's internal Service Orders. Therefore, KPMG Consulting recommends that a benchmark standard be established that reports the percent of Qwest Service Orders that are completely consistent with the LSR received from the CLEC, and establishes the percentage of Services Orders that must be consistent with their related LSRs.

KPMG Consulting also recommends that three levels of disaggregation be reported for this measure: manually submitted orders; electronically submitted orders that fall out; and, electronically submitted orders that flow through.

Summary

In summary, KPMG Consulting proposes the following:

- Change PIDS OP-3, OP-4 and OP-15 to add disaggregations for:
 - Manually submitted orders;
 - Electronically submitted orders that fall out; and
 - Electronic submitted orders that flow through.
- Define new PIDS for:
 - Functional Acknowledgements of manually submitted orders;
 - Accuracy of LSR Rejection Notices;
 - Conformance of FOC due dates with the SIG; and
 - Service Order Accuracy.

Attachment 17

1 BEFORE THE PUBLIC UTILITIES COMMISSION
 2 OF THE STATE OF COLORADO
 3 Docket No. 02M-260T
 4 * * *
 5 IN THE MATTER OF THE COLORADO PUBLIC UTILITIES
 6 COMMISSION'S RECOMMENDATION TO THE FEDERAL
 7 COMMUNICATIONS COMMISSION REGARDING QWEST
 8 CORPORATION'S PROVISION OF IN-REGION, INTERLATA
 9 SERVICES IN COLORADO.

10 -----
 11 Pursuant to continuation, the workshop was heard
 12 at 8:30 a.m., June 12, 2002, at 1580 Logan Street,
 13 Office Level 2, Denver, Colorado, before Chairman
 14 Raymond Gifford and Commissioner
 15 James Dyer.

16 APPEARANCES
 17 (As noted in the transcript.)

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1 EXAMINATION

| | | |
|----|-----------------------------------|-----|
| 2 | LYNN NOTARIANNI | |
| | CHRIS VIVEROS | |
| 3 | Presentation by Ms. Notarianni | 7 |
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| 4 | Examination by Ms. Doberneck | 89 |
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11 EXAMINATION

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1 P R O C E E D I N G S

2 CHAIRMAN GIFFORD: If we could resume

3 Docket 02M-260T.

4 We're here on the morning of the third

1 time they found that there were errors in seven of the
2 49 additional orders that they looked at, correct?

3 A Yes, I believe those were the numbers.

4 Q I understood your testimony this
5 morning when you were responding to a criticism that
6 Mr. Finnegan had made having to do with application
7 dates. I believe your testimony this morning was, our
8 systems couldn't do a later application date if they
9 wanted to because of internal system checks; is that
10 fair?

11 A I think that's fair.

12 Q There could be a situation, couldn't
13 there, Mr. Viveros, where if Qwest receives an order
14 before a 3:00 cutoff on a particular day and that
15 order falls out for manual processing and for some
16 reason a Qwest rep doesn't get to it until the next
17 day, that the next day's application date could or
18 would be put on that order, correct?

19 A It's true that that's certainly
20 a potential. That an order that came in one day
21 doesn't get worked until the next day and that the
22 representative could use the current day instead
23 of the prior day in assigning the application date.

24 While it's possible, and I think
25 certainly we've talked about this concept in whether

□

1 it was focused O and E calls or the ROC TAG, I'm not

2 sure, but certainly it shouldn't come as a surprise
3 that our service center strive very much to an
4 in-today/out-today approach, so that orders that are
5 received during the day are processed that same day,
6 and certainly as you get later into or closer to the
7 hour when the center shuts down and they go home,
8 there's opportunity for that but that it is a limited
9 opportunity.

10 Q In discussing manual processing and
11 human errors -- I apologize in advance for asking
12 this question but I'm not sure who else to ask it of.
13 Were you here yesterday when your counsel I'm not sure
14 whether to say testified or argued but talked about
15 some of the FCC's requirements in some of the FCC's
16 findings?

17 A Yes, I was.

18 Q He was discussing the New York
19 decision and was discussing a criticism that AT&T
20 had raised in that application having to do with
21 human errors in process. Do you recall that?

22 A Yes.

23 Q The FCC's rejection of that argument.
24 Do you recall that?

25 A I believe so, yes.

□

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1 Q I don't know how familiar you are with
2 the New York order. I certainly can show it to you if
3 you don't have it. But would you agree with me or
4 agree subject to check that Bell Atlantic New York in

5 addition to having OP-5 measures also had PIDs that
6 measured order confirmation accuracy and service order
7 accuracy for manually processed orders?

8 A I don't know.

9 MS. TRIBBY: Your Honor, this is my
10 last question, but since we don't have a closing
11 argument, I feel I need to bring this in.

12 BY MS. TRIBBY:

13 Q Read quickly because we don't have
14 much battery. Could you read the highlighted portion
15 of paragraph 171 from the Bell Atlantic New York
16 order.

17 A "Bell Atlantic measures the accuracy
18 of its manual processes in at least two ways: One,
19 accuracy of order confirmation notices, order
20 confirmation accuracy; and, two, overall accuracy of
21 competing carrier orders entered into its service
22 order processor (service order accuracy)."

23 Q Thank you. I will represent to you
24 that the way I read the Bell Atlantic New York order,
25 that in addition to the OP-5 results is what the FCC

□

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1 based its determination on with respect to Qwest's --
2 I'm sorry, Bell Atlantic's human error problem.
3 Do you know -- in fact, it's the case that Qwest does
4 not have measures, at least PIDs, that it reports on
5 that measures order confirmation accuracy and service
6 order accuracy for manually processed orders; isn't

Attachment 18

WHITE PAPER
Firm Order Confirmation Evaluation Results

August 6, 2001
Version 1.0

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1. Introduction

CGE&Y has submitted 7 Incident Work Orders (IWOs) relating to Qwest's FOC and jeopardy notification processes and Qwest has responded to each IWO individually. In addition, Qwest believes that a comprehensive response will be helpful.

This memorandum contains the following sections and conclusions:

1. An analysis of Qwest's performance results, which demonstrates that overall, Qwest is meeting the standards set for FOCs.
2. An explanation of Qwest's overall FOC and jeopardy processes, which indicates that Qwest has standard, defined processes.
3. A summary of CGEY-issued IWOs and Qwest responses, which define both areas where the Pseudo-CLEC made invalid assumptions and areas where Qwest personnel did not follow procedures and have been coached and monitored to follow the defined methods and procedures.

The overall analysis of these three areas demonstrates that Qwest utilizes the FOC and jeopardies processes appropriately and that overall, Qwest is meeting the performance measurement standard for FOC returns.

2. PO-5 FOC Performance Results

2.1 PO-5 Performance Standards

| | |
|---------------------|---|
| PO-5A (all): | 95% within 20 minutes |
| PO-5B (all): | 90% within standard FOC intervals |
| PO-5C (manual): | 90% within standard FOC intervals plus 24 hours |
| PO-5D (LIS Trunks): | 85% within eight business days |

2.2 PO-5 Performance Matrix:

The following matrix provides January through May 2001 performance results for PO-5 (PO-5A-1(a, b, c), 5A-2(a, b, c), 5B-1(a, b, c), 5B-2(a, b, c), 5C(a, b, c), and 5D) of the pseudo-CLEC in comparison to the CLECs aggregate result. A 'Comments' column provides further clarification on results when appropriate.

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As the matrix demonstrates, Qwest has been meeting its FOC benchmarks and continues to improve each month.

| PO-5A-1 – 95% FOCs on Time for Fully Electronic LSRs Received via IMA GUI | | | |
|--|---------------|--------------|---|
| PO-5A-1 (a) Resale Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | 100% | 99.18% | |
| Feb/01 | 100% | 98.96% | |
| March/01 | 100% | 99.79% | |
| April/01 | 100% | 99.65% | |
| May/01 | 100% | 99.52% | |
| PO-5A-1 (b) Unbundled Loop Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 58.54% | Prior to the release installed in February, the processing time for Unbundled Loop requests exceeded the 20-minute FOC timeline. Aggressive work was completed in February, which improved flow-through capability, thus, steadily improving the FOC performance as shown in the Feb-May results. |
| Feb/01 | NA | 92.86% | |
| March/01 | NA | 96.05% | |
| April/01 | 100% | 100% | |
| May/01 | 100% | 99.22% | |
| PO-5A-1 (c) LNP | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 100% | |
| Feb/01 | NA | 99.48% | |
| March/01 | NA | 99.45% | |
| April/01 | NA | 99.21% | |
| May/01 | NA | 99.81% | |

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| PO-5A-2 – 95% FOCs on Time for Fully Electronic LSRs Received via IMA EDI | | | |
|---|--------|--------|------------------------------------|
| PO-5A-2 (a) Resale Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | 50% | 99.65% | Only 2 pseudo-CLEC orders for Jan |
| Feb/01 | NA | 99.23% | |
| March/01 | 100% | 99.60% | |
| April/01 | 100% | 99.51% | |
| May/01 | 100% | 98.58% | |
| PO-5A-2 (b) Unbundled Loop Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 33.33% | Only 6 orders for all CLECs in Jan |
| Feb/01 | NA | NA | |
| March/01 | NA | NA | |
| April/01 | 100% | 97.37% | |
| May/01 | 100% | 100% | |
| PO-5A-2 (c) LNP | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 91.67% | |
| Feb/01 | NA | 100% | |
| March/01 | 100% | 100% | |
| April/01 | NA | 100% | |
| May/01 | NA | 100% | |

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| PO-5B-1 – 90% FOCs on Time for Electronic/Manual LSRs Received via IMA GUI | | | |
|--|--------|--------|--|
| PO-5B-1 (a) Resale Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | 96.12% | 96.51% | |
| Feb/01 | 94.62% | 98.07% | |
| March/01 | 91.54% | 97.24% | |
| April/01 | 79.41% | 97.79% | This result was an anomaly in performance that has no clear root cause. The misses for the pseudo-CLEC showed no specific pattern or trends. |
| May/01 | 93.75% | 96.27% | |
| PO-5B-1 (b) Unbundled Loop Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 98.40% | |
| Feb/01 | 100% | 99.43% | |
| March/01 | 100% | 97.83% | |
| April/01 | 85.71% | 86.31% | Performance in this area decreased in April due to an aggressive training program which pulled people away from typing. The dip is an anomaly in otherwise steady performance. |
| May/01 | 100% | 99.49% | |
| PO-5B-1 (c) LNP | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 93.71% | |
| Feb/01 | 100% | 99.44% | |
| March/01 | 100% | 98.20% | |
| April/01 | NA | 97.92% | |
| May/01 | NA | 99.02% | |

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| PO-5B-2 – 90% FOCs on Time for Electronic/Manual LSRs Received via IMA EDI | | | |
|--|--------|--------|--|
| PO-5B-2 (a) Resale Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | 92.16% | 99.32% | |
| Feb/01 | 71.19% | 96.25% | Misses for the P-CLEC were due to late processing of the LSRs and no specific patterns or trends were identified. However, controls have been put in place to monitor in today/out today processing to ensure timely FOC performance. |
| March/01 | 80.20% | 98.82% | Misses for the P-CLEC were due to late processing of the LSRs and no specific patterns or trends were identified. However, controls have been put in place to monitor in today/out today processing to ensure timely FOC performance. |
| April/01 | 72.95% | 98.63% | Of the 27% orders missed for the P-CLEC, 11% were related to the backlog in Complex EDI orders. The backlog was cleaned up in an effort which did not complete until the first few days of May. The other 16% were associated with the initial challenges Qwest had in simultaneously handling work loads from the EDI 6.0 and EDI 7.0 work queues following the April release of IMA 7.0. |
| May/01 | 73.68% | 99.64% | All of these misses for the P-CLEC were associated with the initial challenges Qwest had in simultaneously handling work loads from the EDI 6.0 and EDI 7.0 work queues following the April release of IMA 7.0. |
| PO-5B-2 (b) Unbundled Loop Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 97.74% | |
| Feb/01 | 100% | 100% | |
| March/01 | 100% | 97.78% | |
| April/01 | 83.33% | 93.95% | Small volumes (18 LSRs) and the overall dip in performance described above caused this anomaly. |
| May/01 | 100% | 97.07% | |

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| PO-5B-2 (c) LNP | | | |
|-----------------|--------|--------|--|
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 55.77% | The LNP FOC process was reviewed during first quarter with process changes implemented from mid-April to mid-May. A strong result in May reflects this implementation. |
| Feb/01 | NA | 98.17% | |
| March/01 | NA | 81.63% | See Jan comments. |
| April/01 | NA | 80% | See Jan comments. |
| May/01 | NA | 92.44% | |

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| PO-5C – 90% FOCs on Time for Manual LSRs Received | | | |
|---|--------|--------|--|
| PO-5C (a) Resale Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 98.95% | |
| Feb/01 | NA | 82.50% | 49% of the LSRs for this month were submitted by one CLEC 2/13/01. A single CLEC submitted another 19% of the total volume on 2/5/01. Despite the center's ability to resource share, it is difficult to absorb 50% of the month's volume on one day without forecasts or sufficient notice. |
| March/01 | NA | 93.97% | |
| April/01 | NA | 97.24% | |
| May/01 | NA | 98.76% | |
| PO-5C (b) Unbundled Loops Aggregate | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 81.82% | The small volumes associated with manually submitted Unbundled Loop orders in AZ have contributed to the volatility of this measure. |
| Feb/01 | NA | 100% | |
| March/01 | NA | 91.67% | |
| April/01 | NA | 88.89% | |
| May/01 | NA | 94.12% | |
| PO-5C (c) LNP | | | |
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 53.33% | The LNP FOC process was reviewed during first quarter with process changes implemented from mid-April to mid-May. A stronger result in May reflects this implementation. |
| Feb/01 | NA | 75% | The small volumes associated with manually submitted LNP orders in AZ have contributed to the volatility of this measure. |
| March/01 | NA | 70% | See Jan/Feb comments. |
| April/01 | NA | 76.92% | See Jan/Feb comments. |
| May/01 | NA | 85.71% | See Jan/Feb comments. |

| PO-5D – 85% FOCs on Time for ASRs Requesting LIS Trunks | | | |
|---|--------|--------|----------|
| Month/Year | P-CLEC | CLECs | Comments |
| Jan/01 | NA | 93.10% | |
| Feb/01 | NA | 97.98% | |
| March/01 | NA | 99.16% | |
| April/01 | NA | 100% | |
| May/01 | NA | 98.51% | |

*NA = No activity

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3. Qwest FOC/Jeopardies Processes

This section defines the current FOC, jeopardy, error, and reject processes. The following information is currently being updated in the Product Catalog and will be available to the CLECs by August 17, 2001. The improved processes are being shared with the CLECs so that they will know when to expect notices and the type of notice(s) that are generated. The FOC processes will be located on the web in the Provisioning General Section of the PCAT and the URL is <http://www.qwest.com/wholesale/clecs/provisioning.html>. The FOC process is listed under Provisioning Points of Interface.

Additionally, this updated information is provided to Qwest personnel through the internal Methods & Procedures documentation.

In all the Qwest serving areas, the centers are reviewing FOC results on a daily basis and a leadership review is held on a weekly basis to identify where training and assistance are needed.

3.1 Firm Order Confirmations Procedures

Upon receipt of a Local Service Request (LSR) Qwest sends a Firm Order Confirmation (FOC) to the CLEC. FOCs are sent in response to CLEC-generated transactions (i.e., original LSR or LSR Supplement (SUP). The FOC acknowledges to the CLEC that Qwest:

- Received the request for service
- Established a Due Date (DD) for the request
- Typed a Qwest service order

In some cases (72 Hour FOC agreements for Unbundled Loop), the FOC also indicates that the assigned facilities have been validated and are ready for installation.

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3.2 Processes for FOC, Error or Reject Notifications

CLEC Notification in Response to LSRs

This table depicts the standard process for when a FOC, Error, OR Reject notification will be sent

| If an LSR: | Then: | And: | Additionally: | Then: |
|--|--|--|--|--|
| Is accepted by Qwest as complete | Qwest sends the CLEC an FOC | | | |
| Is found to have a non-fatal error | Qwest sends the CLEC an Error Notification | Waits up to 2 hours for the CLEC to send a SUP correcting the error on all product types except LNP. Qwest waits for up to 4 hours for the CLEC to send a SUP correcting errors on LNP requests. | If the error is corrected on a SUP and the LSR is found to be complete. | Qwest sends the CLEC an FOC |
| | | | If the error is not corrected within 4 hours for LNP and 2 hours for all other product types | Qwest sends the CLEC a Reject notification |
| Is found to have a fatal error | Qwest sends the CLEC a Reject Notification | Waits for the CLEC to correct the fatal error and treats the corrected LSR as the first version | Once the fatal error is corrected and the replacement LSR is found to be complete | Qwest sends the CLEC an FOC |
| Has already been FOC'd and Qwest subsequently detects an error | Qwest sends the CLEC an Error Notification | Waits up to 2 hours for the CLEC to send a SUP correcting the error on all product types except LNP. Qwest waits for up to 4 hours for the CLEC to send a SUP correcting errors on LNP requests. | Once the error is corrected on a SUP and the LSR is found to be complete | Qwest sends the CLEC a FOC |

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This table depicts common situations encountered when processing FOCs and the associated processes

| Key Topic | If an LSR: | And: | Then: |
|--|--|--|---|
| Invalid DDD (Desired Due Date) | Reflects an invalid DDD <ul style="list-style-type: none"> ▪ shorter than the standard interval ▪ Saturday ▪ Sunday ▪ Holiday | The DDD on an LSR cannot be honored | The typist displays the due date on the FOC to reflect the due date entered on the Qwest service order. |
| Previously FOC'd LSR with incorrect DD | Has been FOC'd | The FOC indicated an incorrect due date which was not initially detected | The typist corrects the due date, and sends a subsequent FOC advising the CLEC of the due date change/correction. |
| Expedite | Requests a shorter than standard interval and populates the expedite field | The current expedite process is followed. | The FOC is rendered and contains the due date that Qwest agrees to, regardless if that date is based on the standard interval or an agreed upon expedited date. |
| Escalation | Has been FOC'd and found to be unacceptable to the CLEC | The CLEC may escalate. | If the escalation is successful and a shorter due date is assigned, a SUP should be generated from the CLEC changing the due date, which would then be FOC'd. |

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3.3 Jeopardy Notification

The purpose of the jeopardy notification process is to identify facility problems or other impacts to meeting the scheduled due date of a service order. For LSRs where the service order is delayed for facility conditions, the Qwest centers send jeopardy notifications to the CLECs. The sequencing of a jeopardy notification and an FOC changes depending on when the facility condition is identified.

3.3.1 Jeopardy Notification Process Table

This table provides clarification on Jeopardy notification related to Qwest delays:

| If an LSR goes into a Delayed Order condition and it is detected: | And: | Then the following occurs: |
|---|--|---|
| Prior to the due date | The RFS (Ready for Service Date) is not known | <ol style="list-style-type: none"> 1. Qwest sends the CLEC a jeopardy notice. 2. Once the RFS (Ready for Service Date) is known, an FOC is sent to the CLEC advising of the due date Qwest can meet. |
| Prior to the due date | The RFS is known | A jeopardy notification is sent as part of the FOC to the CLEC along with the due date that Qwest can meet. |
| On the due date | Once the Qwest Interconnect Service Center is advised of the condition and the RFS is not known | <ol style="list-style-type: none"> 1. Qwest sends the CLEC a jeopardy notice. 2. Once the RFS (Ready for Service Date) is known, an FOC is sent to the CLEC advising of the due date Qwest can meet. |
| On the due date | Once the Qwest Interconnect Service Center is advised of the condition and the RFS is known | A jeopardy notification is sent as part of the FOC to the CLEC along with the due date that Qwest can meet. |
| A CLEC (without a 72 Hour Agreement*) ordered Unbundled Loop service and authorized the removal of Bridge Taps or Load Coils on the LSR *Will stop once all CLECs have a 72-Hour Agreement | After the original FOC was issued Qwest determined that conditioning is required | Notification of the due date change is provided on the FOC, with specific remarks stating the subsequent FOC is due to the need for conditioning. No separate Jeopardy notice is sent since it is provided as part of the FOC notification. |
| A CLEC has a specific FOC agreement with Unbundled Loop | If the order(s) has a facility problem | The jeopardy notification is communicated to the CLEC as specified in the 72-Hour Agreement. |

When the FOC is associated with a jeopardy condition, it must contain specific remarks stating the jeopardy reason and providing the new due date (RFS), if available.

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Exceptions to sending a jeopardy notice are associated with Unbundled Loop services with special FOC arrangements for up-front bridge tap or Load Coil authorizations and facility verification as part of the FOC. These situations are **not** considered jeopardies so all necessary detail is addressed by the FOC.

Exceptions to sending jeopardy notifications are depicted in the following two tables.

3.3.2 CLEC Related Conditions That Do Not Result in Jeopardy Notifications Table

This table shows the processes for situations that are CLEC related jeopardies

| If: | Then the following occurs: | However: |
|--|---|--|
| The due date on the LSR is in jeopardy due to CLEC reasons: <ul style="list-style-type: none"> ▪ No Access ▪ CLEC not Ready ▪ End User not ready | Then neither a jeopardy notice nor a FOC is sent. | CLECs who opt for the auto-push information can see the status of the Qwest service order. Additionally, since our technician is in contact with the CLEC, they should already be aware of the jeopardy situation. Further for the specific products, Unbundled loop, Centrex and Complex Resale, the CLECs are contacted to try to establish a new due date where the orders are either SUPP'd by the CLECs or eventually canceled. |
| The original LSR was FOC'd with less than a standard interval | A subsequent FOC is sent to correct the due date to the standard interval with notes advising the CLEC of the reason for the subsequent FOC | |
| The original LSR was FOC'd with errors or information was changed (i.e., order numbers were typed incorrectly or the order numbers were changed for some reason or a typing error of any other nature) | A subsequent FOC is sent to the CLEC with notes explaining the reason for the FOC. | |

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4. Incident Work Orders (IWOs)

CGE&Y have generated 7 IWOs relating to Qwest FOC processes. The IWOs reflect a relatively equal split of CLEC education opportunities and Qwest process errors.

Process conformance continues to be an area of focus, as it has been since the opening of the Interconnect Service Centers. Qwest uses Multi-Channel Communicators (MCCs) to internally share new or revised processes and to review existing processes. In addition, service orders for each employee are reviewed in every center on an ongoing basis to identify individual training issues. Also, a Qwest focus team continues to supplement the efforts of our Customer training and documentation.

4.1 IWO Matrix

This matrix provides a high-level overview of the 7 CGE&Y-issued IWOs as well as a summary of Qwest's responses.

| Remedy | Tracking # | Title | Rec'd | Initial Resp Supp Resp | Summary/Status |
|------------------------------------|--------------|-----------------|---------|---------------------------------------|--|
| Customer Education and Training | 241/IWO 2068 | Late FOCs | 3/05/01 | 4/02/01 | <p>Incident: PCLEC expected that orders would flow through. FOCs should be received within 20 minutes.</p> <p>Response: Orders failed flow-through because 1) products were not eligible, 2) orders were not eligible</p> <p>A few orders failed because of Qwest data errors.</p> |
| MCC Coaching IMA 7.0 report | 242/IWO 2069 | No FOC received | 3/05/01 | 3/23/01 6/15/01 7/02/01 | <p>Incident: 15 orders with no FOC or late FOCs</p> <p>Response: 8 Orders (5 complex resale not flow through eligible, 3 UNE-P of which 2 were flow through eligible & 1 was not) received FOCs within the FOC interval. 3 Orders received no FOCs because they were rejected outside the FOC interval. 4 Orders (3 complex resale & 1 POTS resale) received "late" FOCs because they were not eligible for flow-through. As a proactive</p> |

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| Remedy | Tracking # | Title | Rec'd | Initial Resp Supp Resp | Summary/Status |
|---------------------------------------|--------------|---|---------|-------------------------------|---|
| | | | | | measure. in IMA 7.0 ISC reps are able to continuously monitor FOCs for timely completion. |
| MCC Coaching IMA 7.0 interface | 320/IWO 1107 | FOCs issued in error | 5/2/01 | 6/05/01 | Incident: 13 test cases received unsolicited FOCs with DD changes. JEPs received on only 7 orders. Response: In 7 cases the FOC process was not followed appropriately by Qwest; in 5 cases a JEP was not issued due to a problem with a Qwest legacy system; in one case Qwest has no record of a second FOC being sent. |
| MCC Coaching | 329/IWO 1114 | FOCs completed erroneously | 5/10/01 | 5/31/01 6/25/01 7/02/01 | Incident: FOC received after SOC with DD in comments field. Response: Typist created a second FOC when order appeared on "Past Due" report without first verifying completions. |
| Customer Education | 364/IWO 1126 | CLEC agreement | 5/29/01 | 6/05/01 | Incident: COVAD has a contractual agreement with Qwest to change the PO-5 FOC return time to 72 hours in the Phoenix MSA. Via a data request, Qwest excludes this from the PO-5 calculations by adding the predefine codes. Response: Qwest does not exclude the type of order referenced above and did not exclude the specific order. This order was processed correctly and accurately reflected in the measurements. |
| Customer Education | 337/IWO 1116 | Held Order policy for DSL service provided with | 5/16/01 | 5/25/01 | Incident: When a line share DSL request is sent to Qwest and the end user is served from a pair gain |

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| Remedy | Tracking # | Title | Rec'd | Initial Resp Supp Resp | Summary/Status |
|--------------------|-----------------|---|---------|-------------------------------|---|
| | | pair gain causes delayed FOCs | | | configuration, the DLEC receives a FOC jeopardy stating held order. The end-customer finds another provider. Response: Compatible facilities were not available because the end-user was served by pair gain. Spare copper facilities were not available for DSL service. The service may have been provisioned as an ISDN circuit, but the order was cancelled before the order could be provisioned. The Build Policy did not apply because the service was for a second line. CGEY: 7/27 Withdrawn |
| Customer Education | 338/1WO 1117 | Delay in receiving detail JEP info | 5/16/01 | 6/29/01 7/13/01 7/17/01 | Incident: When a JEP is issued on a LSR, the initial message is generic. Waiting a day for the root-cause, detailed JEP information is inconvenient to the DLEC and to its end-customers. Response: The held order process provides early warning to CLECs that their DD may be at risk. The information included in the detailed JEP is not available until the following day. CGEY: 7/26 Closed |

5. Conclusion

This overall analysis demonstrates that Qwest utilizes the FOC and jeopardies processes appropriately and that Qwest is meeting the performance measures standard for FOC returns. As demonstrated by this memorandum, Qwest has been meeting its FOC benchmarks and continues to improve CLEC education and Qwest employee training. The performance measures indicate monthly improvement, and training and education processes have been expanded to ensure that the Qwest center personnel adhere to the prescribed

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procedures and the CLECs are provided adequate documentation to assist in their understanding of the procedures. The improved process information will be available in the Product Catalog on August 10, 2001 (<http://www.qwest.com/wholesale/clecs/provisioning.html>).

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